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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF EMILOU MACLEAN
IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR LEAVE TO
FILE A SUPPLEMENTAL COMPLAINT
PURSUANT TO FED. R. CIV. P. 15(D)**

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1 I, Emilou MacLean, declare as follows:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of
4 record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration
5 and, if called as a witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Plaintiffs' Motion for Leave to File a
7 Supplemental Complaint pursuant to Federal Rule of Civil Procedure 15(d).

8 3. On July 2, 2025, Plaintiffs notified Defendants of their intent to supplement the First
9 Amended Complaint to include claims arising from the July 1, 2025 termination of Haiti's
10 Temporary Protected Status ("TPS") designation by the Secretary of the Department of Homeland
11 Security ("DHS"). *See Ex. 1.*

12 4. Defendants responded the same day, requesting a copy of the proposed supplement to
13 make an informed decision. Plaintiffs provided further detail regarding the intended supplemental
14 allegations and claims. Defendants confirmed via email that they would not oppose Plaintiffs'
15 motion to supplement the complaint. *Id.*

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed this 7th day of July 2025, in San Francisco, California.

19
20 /s/ Emilou MacLean
Emilou MacLean